

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:	Dudley Jerome Greene, Jr.)	
	Amber Marks Greene)	Case No. 3:11-BK-30789-KRH
	Debtors.)	Chapter 13
)	
Address)	
	Dudley Jerome Greene, Jr.)	
	Amber Marks Greene)	
)	
)	
Last four digits of SSN or ITIN:	5745)	
	2202)	

NOTICE OF MOTION TO CONTINUE HEARING ON SHOW CAUSE

Jason M. Krumbein, Esq. has filed papers with this court seeking approval to continue the hearing on the order to show cause.

Your rights may be affected. You should read these papers carefully, and discuss them with your attorney in this Bankruptcy Case, if you have one. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before 7 DAYS FROM TODAY, you or your attorney must:

File with the court and mail a copy to the Debtors' counsel, at the addresses shown below, a written request for a hearing. If you mail your request for hearing to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of the Court
U.S. Bankruptcy Court
701 E. Broad St., Suite 4000
Richmond, VA 23219

Jason M. Krumbein, Esq.
America Law Group, Inc
8501 Mayland Dr. Suite 106
Richmond, VA 23294

You must also attend a hearing to be scheduled at a later date.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion, and may enter an order granting that relief.

Date: June 3, 2016

/s/ Jason M. Krumbein, Esq.
8501 Mayland Drive, Suite 106
Richmond, VA 23294
VSBN 43538
Counsel for Debtor in Bankruptcy

CERTIFICATE OF SERVICE

See certification in Application Attached hereto

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MOTION TO CONTINUE HEARING ON ORDER TO SHOW CAUSE

COMES NOW, Jason M. Krumbein, and says as follows:

JURISDICTION, VENUE, CORE PROCEEDING

- 1) This court has jurisdiction pursuant to 28 USC 1441.
- 2) This is the proper venue pursuant 28 USC 1391.
- 3) This is a core proceeding pursuant to 28 USC 157.

FACTS

- 4) The court issued an order to show cause and set a hearing for June 22, 2016, at 12:00. Docket #95.
- 5) Counsel is scheduled to be on vacation out of the country June 10, 2016 through July 3, 2016.
- 6) Counsel would like the chance to respond to the court, in an appropriate manner.

RELIEF REQUESTED

Movants request that the court continue the hearing on the order to show cause to July 6, 2016 at 12:00 so that counsel may be present.

/s/ Jason M. Krumbein, Esq.
Jason M. Krumbein, Esq. VSBN 43538
Counsel for the Debtor(s) in Bankruptcy
America Law Group, Inc
8501 Mayland Dr. Suite 106
Richmond, VA 23294
Tel: 804.308.0051 Fax: 804.308.0053
jkrumbein@krumbeinlaw.com

CERTIFICATE OF SERVICE

I certify that I have this June 3, 2016, transmitted a true copy of the foregoing application electronically through the court's CM/ECF system to the Chapter 13 Trustee and US Trustee.

/s/ Jason M. Krumbein, Esq.
Counsel for the Debtor(s) in Bankruptcy